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REMARKS

Claims 1, 3-8, 10-23 and 25-30 are pending in the application. Claims 1, 3-8, 10-23 and 25-29 were rejected under 35 U.S.C. § 103 (a).

Rejection Under 35 U.S.C. § 103 (a)

Claims 1, 3-8, 10-23 and 25-30 were rejected under 35 U.S.C. § 103 (a) as being unpatentable over U. S. Patent Number 6,608,891 issued to Pelletier on August 19, 2003 in view of U. S. Patent Number 6,625,141 issued to Glitho on September 23, 2003.

Applicants respectfully traverse this ground of rejection for the following reasons. First, applicants' claim 1 recites,

"a service control component that provides to one or more telephony devices of a plurality of telephony devices on a call, one or more services associated with one or more numbers associated with the one or more telephony devices on the call; and

one or more application server components which cooperate with the service control component through employment of a Session Initiation Protocol to establish one or more data streams between the service control component and the one or more application server components to provide the one or more services."

As stated in the Final Office Action, Pelletier does **not** teach or suggest "a Session Initiation Protocol". This is because Pelletier discloses intelligent network system components that utilize the SS7 protocol, as stated in column 5, lines 43-50, and the ISDN PRA protocol as stated in column 6, lines 45-48.

The Examiner has asserted that Pelletier discloses "one or more application server components which cooperate with the service control component to establish one or more data streams between the service control component and the one or more application server components to provide the one or more services". Applicants agree that Pelletier discloses a SN/IP 20 that may be a computer or a communications server, as stated in column 6, lines 42-43. However, SN/IP 20 is connected to a TCP/IP interface 22, a radio frequency (RF) interface 24, a database 26 and SSP 14. See FIG. 4. SN/IP 20 is **not** connected to a service control point, e.g., SCP 18. SN/IP 20 obtains

information via TCP/IP interface 22 and RF interface 24, and saves the information in database 26 from where information is sent to subscribers. See column 6, lines 52-58. Pelletier does **not** disclose that SN/IP 20 forwards the information to SCP 18 to provide services. Thus, Pelletier is missing the "one or more application server components which cooperate with the service control component to establish one or more data streams <u>between</u> the service control component and the one or more application server components to provide the one or more services" elements, as recited in applicants' claim 1.

Second, the problem which Pelletier addresses is the need for a system that provides an information service that enables a subscriber to quickly obtain desired information without requiring that the subscriber memorize numbers or spend additional money on hardware. See column 1, lines 63-67. As known by those skilled in the art, SIP is used for user sessions that involve multimedia elements, e.g., multimedia conferences, multimedia distribution, distance learning, Internet Telephony, etc., and Pelletier does **not** disclose multimedia elements. Since the teachings of Pelletier adequately address the problem of a system that provides an information service that enables a subscriber to quickly obtain desired information, and Pelletier does **not** disclose user sessions that involve multimedia elements that require SIP-based network elements, there is no need for SIP in Pelletier. Furthermore, the addition of SIP in Pelletier would require the purchase of SIP-based network elements, e.g., SIP servers, in contradiction to Pelletier's objective of providing an information service **without** spending additional money on hardware.

Third, applicants agree that Glitho discloses a Session Initiation Protocol used to communicate with SIP network elements. However, the proposed combination of Glitho with Pelletier does **not** reflect the specific limitations recited in applicants' claim 1 since the resultant system would **not** be a properly functioning system. Specifically, Pelletier's technique requires the use of <u>common channel signaling based on signaling system 7 protocol</u> for communications between the SCP and other intelligent network system components, as stated in column 5, lines 35-50.

By contrast, Glitho's technique does **not** use common channel signaling based on signaling system 7 protocol for communications between the SCP and other

intelligent network system components, because Glitho discloses that <u>SIP messaging</u> <u>formats are extended so that SIP servers are provided with the capability to access the</u> <u>service logic stored in IN-based nodes, i.e., SCPs</u>, as stated in column 7, lines 15-30. In fact, Glitho teaches away from the proposed combination because Glitho discloses that the two protocols, SIP and intelligent network (i.e., SS7), follow different approaches and can**not** be easily combined harmoniously, as stated in column 2, lines 18-33. Also, Glitho discloses in column 2, lines 22-33,

> "SIP is a lightweight, text-based protocol designed for Internet applications where space efficiency is of little concern. On the other hand, IN protocols are binary (i.e., coded in the Abstract Syntax Notation or ASN) and optimized for providing a large variety of VAS with parameters provided in rather complicated data structures. Using IN protocols to remotely access service logic in the context of SIP-based networks, accordingly, implies imposing additional functionality on IP telephony entities and introducing an extra category of "heavyweight" protocols in the network environment."

In other words, Glitho offers a technical basis for **not** combining SIP and the SS7 protocols as disclosed in Pelletier. Thus, the system resulting from the proposed combination would **not** be a properly functioning system based on Pelletier.

Accordingly, since a person skilled in the art would **not** look to combine the references as suggested and since the combination would **not** result in the invention as claimed, applicants submit that the combination and resultant rejection are improper, and therefore claim 1 is allowable over the proposed combination. Since claims 3-8, 10-22 and 27-30 depend from allowable claim 1, these claims are also allowable over the proposed combination of Pelletier and Glitho.

Independent claims 23 and 26 each have a limitation similar to that of independent claim 1, which was shown is not taught by the proposed combination of Pelletier and Glitho. For example, claim 23 recites "establishing communications between one or more service control components and one or more application server components through a Session Initiation Protocol to establish one or more data streams based on the information", and claim 26 recites "means in the one or more media for
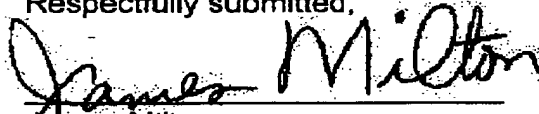
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providing, by one or more service control components communicating with one or more application server components, one or more services to one or more telephony devices on a call through employment of a Session Initiation Protocol to establish one or more data streams between the one or more service control components and the one or more application server components". The proposed combination of Pelletier and Glitho does not teach or suggest these limitations for the above-mentioned reasons. Therefore, claims 23 and 26 are likewise allowable over the proposed combination. Since claim 25 depends from claim 23, this dependent claim is also allowable over the proposed combination.

Conclusion

It is respectfully submitted that the Office Action's rejections have been overcome and that this application is now in condition for allowance. Reconsideration and allowance are, therefore, respectfully solicited.

In view of the above amendments and remarks, allowance of all claims pending is respectfully requested. If a telephone conference would be of assistance in advancing the prosecution of this application, the Examiner is invited to call applicants' attorney.

Respectfully submitted,

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